IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA on behalf of himself and others similarly situated,

:

Plaintiff,

Case No. 1:19-cv-12235-LTS-PK

v.

QUOTEWIZARD.COM, LLC

Defendant.

DECLARATION OF ALEX M. WASHKOWITZ

I, Alex M. Washkowitz, declare as follows:

- 1. I am an attorney duly admitted to practice in the Commonwealth of Massachusetts, I am over 18 years of age, I am competent to testify and make this affidavit on personal knowledge. I make this declaration in support of Plaintiff's Motion for Preliminary Approval. In this declaration I will describe the work that I and my co-counsel have done in identifying and investigating potential claims in the action and to set forth my qualifications to serve as class counsel, and describe my experience in representing plaintiff classes in class actions, and cases brought under the 47 U.S.C. § 227, the Telephone Consumer Protection Act. ("TCPA").
- 2. I have been involved in representing Plaintiff in this case from the outset, from pretrial investigation, analysis of Plaintiff's potential claims, and review of documents and discovery responses as well as depositions. Based on my experience in prosecuting class actions under the TCPA, I believe this Settlement satisfies all of the requirements of Rule 23 of the Federal Rules of Civil Procedure, represents an excellent result for the Settlement Class and merits preliminary and final approval from the Court.

- 3. I have experience in the prosecution of claims under the Telephone Consumer Protection Act, 47 U.S.C. §227. ("TCPA"). As a result of my experience litigating TCPA claims, I am well-aware of the significant time and resources needed to litigate such actions, and my Firm, as well as my co-counsel possesses the resources necessary to prosecute these actions successfully. My firm keeps contemporaneous time records, and the rates for our attorneys and personnel are commensurate with my experience and are commensurate with market rates in Boston for attorneys with similar levels of experience.
- 4. Based on my experience in TCPA class actions, I believe the proposed settlement in this case represents an excellent result for the proposed class and merits preliminary and final approval by the Court.
- 5. I am a 1999 graduate of Suffolk University Law School. Following graduation from law school, I have been employed as a full time Federal Law Enforcement Officer with the United States Government.
- 6. In August 2014, I co-founded the firm of CW Law Group, PC, focusing approximately one half of our practice on the representation of consumers for claims including the TCPA, and working with other more experienced firms in consumer class litigation.
- 7. I was appointed co-class counsel in <u>Clough v. Revenue Frontier</u>, 1:17-cv-00411-PB, a TCPA class action in which adversary class certification was granted, with a \$2,100,000 class action settlement approved on September 10, 2020.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED THIS THIS 21st DAY OF MAY, 2025 IN THE COMMONWEALTH OF MASSACHUSETTS.

/s/ Alex M. Washkowitz
Alex M. Washkowitz

2